

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

ROY STEWARY MOORE, et al

Plaintiffs,

v.

SASHA NOAM BARON COHEN, et al

Defendants.

Case No: 1:18-cv-02082

**PLAINTIFFS' SUPPLEMENT TO OPPOSITION TO DEFENDANTS' MOTION TO
TRANSFER**

Plaintiffs Roy Moore and Kayla Moore ("Plaintiffs") hereby submit the following supplement to their Opposition to Defendants' Motion to Transfer. ECF No. 15. This supplement contains a newly published article from the pro-Sasha Baron Cohen and left-leaning *Salon* Magazine dated December 25, 2018 – 2 weeks after Plaintiffs' original opposition was filed. Exhibit 1 (the "*Salon* Article"). Since the *Salon* Article was only published yesterday, it could not possibly have been included in Plaintiffs' original opposition. However, it contains extremely relevant and important evidence, which contain admissions from Cohen and the other Defendants, that detail exactly the extent to which Defendant Sasha Baron Cohen's ("Cohen") and the other Defendants' activities were linked with and targeted to the District of Columbia with regard to "*Who is America?*"

The *Salon* Article details how Defendant Cohen nearly fraudulently duped Secretary of Housing and Urban Development Ben Carson into appearing on "*Who is America?*". As per Defendant Cohen's own admission, "[w]e set up an interview with Dr. Ben Carson and we had a hotel room in the Mandarin Oriental in DC... **I'd been living in DC, undercover, for about**

three weeks. Bernie Sanders' people had become suspicious from day one, and so I needed to ensure that nobody knew that I was there. That no one recognized me for three weeks. So I was basically living undercover and in disguise for three weeks. And in the last couple of days, Ben Carson agrees to an interview." Exhibit 1 (emphasis added).

Not coincidentally, the Mandarin Hotel is also where Plaintiff and his wife Kayla Moore were sent to stay by the Defendants, while awaiting their interview and claimed presentation of an award from the state of Israel.

Defendant Cohen and the other Defendants, admittedly, were therefore personally based in Washington D.C. during the filming of "*Who is America?*". Cohen was "living in DC, undercover, for about three weeks." As with Judge Moore and Kayla Moore, the interview with Mr. Carson was also to take place in Washington D.C., in this judicial district. Defendant Cohen also admitted to attempting to defraud U.S. Secret Service agents in Washington D.C. in order to fraudulently induce Mr. Carson to appear on camera:

I was in the other room and I got on the phone to my lawyer and said listen, there's an issue. What happens if a part of his security detail asks for my ID? Because if I give them my real ID we're done, and so I had a fake ID on me with the name of my character, this Finnish unboxing YouTube star [the character was OMGWhizzBoyOMG], and he said, 'if you give out a fake ID they'll arrest you and you'll probably go to jail.' So we came up with a solution, which was, if my ID fell on the floor and they picked it up and they made the assumption that this fake ID was real, then I hadn't actually misled the Secret Service.

The admissions in the *Salon* Article clearly show that Defendant Cohen was engaged in business on behalf of himself, Defendant Showtime, and Defendant CBS while in the District of Columbia. These admissions also line up, conform with and verify Plaintiff's alleged facts, where Defendant Cohen fraudulently disguised himself as Erran Morad in order to induce Judge Moore to appear on camera – again - in Washington D.C. The *Salon* Article therefore confirms and proves the extent to which "*Who is America?*" and Defendants are inextricably tied to

Washington D.C. As such, it cements the reality that venue and jurisdiction for Plaintiffs' claims can only properly lie in this judicial district.

Dated: December 27, 2018

Respectfully submitted,

/s/ Larry Klayman

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed electronically and served through the court's ECF system to all counsel of record or parties on December 27, 2018.

/s/ Larry Klayman

Larry Klayman, Esq.

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The story of how the secretary of housing and urban development was nearly duped on "Who is America"

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MATTHEW ROZSA

DECEMBER 25, 2018 12:00PM (UTC)

Sacha Baron Cohen's new show *Who Is America?* was a major hit, one in which the comedian went undercover and interviewed prominent politicians from Sen. Bernie Sanders of Vermont and former Alabama Senate candidate Roy Moore to former Vice President Dick Cheney and former Maricopa County, Arizona sheriff Joe Arpaio. Yet there is at least one politician he was unable to successfully interview, and he happens to be a high-ranking official in President Donald Trump's administration — Secretary of Housing and Urban Development Ben Carson.

In an [interview with Deadline](#), Cohen describes how he came very close to interviewing a member of President Donald Trump's administration.

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"We set up an interview with Dr. Ben Carson and we had a hotel room in the Mandarin Oriental in DC," Cohen explained. "I'd been living in DC, undercover, for about three weeks. Bernie Sanders' people had become suspicious from day one, and so I needed to ensure that nobody knew that I was there. That no one recognized me for three weeks. So I was basically living undercover and in disguise for three weeks. And in the last couple of days, Ben Carson agrees to an interview."

After describing how the hotel was filled with Secret Service agents because of a big international conference occurring that was full of politicians, Cohen described how he attempted to make the Carson interview work anyway.

"We booked two hotel rooms. One hotel room I was going to interview Ben Carson in, and obviously, he had his own Secret Service detail and he was coming with White House press staff," Cohen recalled. "I was in the other room and I got on the phone to my lawyer and said listen, there's an issue. What happens if a part of his security detail asks for my ID? Because if I give them my real ID we're done, and so I had a fake ID on me with the name of my character, this Finnish unboxing YouTube star [the character was OMGWhizzBoyOMG], and he said, 'if you give out a fake ID they'll arrest you and you'll probably go to jail.' So we came up with a solution, which was, if my ID fell on the floor and they picked it up and they made the assumption that this fake ID was real, then I hadn't actually misled the Secret Service."

He concluded, "So I go into the room, got past the Secret Service, got in front of the camera. This character has a bunch of Shopkins [collectible toy figures], and the White House press representative was there. He says, 'what are those?' I say, these are Shopkins. He says, 'I know what they are, but why are there Shopkins here?' I go, it's because that's what I do, I unbox Shopkins. And I can see Ben Carson is literally walking in front of the camera. He's just about to enter frame and this guy from the White House had an instinct and he said, 'Pull him.' And suddenly the Secret Service pulled him out. So the most I got to see was Ben Carson's leg."

MATTHEW ROZSA

Matthew Rozsa is a breaking news writer for Salon. He holds an MA in History from Rutgers University-Newark and is ABD in his PhD program in History at Lehigh University. His work has appeared in Mic, Quartz and MSNBC.

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